

Application/Control Number: 09/874,872  
Art Unit: 2613

Docket No.: 2001-0161A

### **REMARKS**

Reconsideration and allowance in view of the proposed claim amendments and the following remarks are respectfully requested. Claims 1-22 and 27-29 remain pending, claims 23-26 have been canceled without prejudice or disclaimer, and claims 1, 13 and 21 are amended without prejudice or disclaimer.

#### **Response Examiner's Remarks in the Advisory Action**

In the Advisory Action, the Examiner has provided his reasons for not placing the Application in condition for allowance. Applicants appreciate the Examiner's entry of the previous amendments and detailed analysis to clarify his position.

The Examiner commented in the Advisory Action that "Note in fig. 33 and col. 42, ln. 62-65, object coders 1504 - 1508 encode video portions associated with the generic model." Applicants agree with this analysis in the sense that each encoder of Lee et al. is taught as a general or generic encoder that simply encodes shape, motion and texture information for each object. There is no teaching that the object coders 1504 - 1508 are anything but "generic" encoders that each encodes objects. This is made clear in the lines 62 - 65 cited by the Examiner where Lee et al. state that "After the object definition phase, the encoder separately codes objects as illustrated in the coding units 1504 - 1508...." In other words, the objects are defined and then each object is sent to a coding unit of the encoder. Where each of the encoders 1504 - 1508 are generic as stated by the Examiner, then the definition step performed by the object definition module 1502 does not necessarily route each object to a particular encoder based on a predefined model (since they are all generic), but simply sends different objects to different encoders.

Applicants have amended claims 1, 13 and 21 to clarify that instead of each encoder being a generic encoder, the invention involves each encoder being associated with one of a plurality of predefined models. Therefore, a dividing line between Lee et al. and the present invention involves utilizing a plurality of encoders, each encoder being different from the

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others according to the plurality of predefined models. This is clearly not taught by Lee et al. and as established by the Examiner wherein FIG. 33, encoders 1504 - 1508 are each the same "generic" encoder. Since Lee et al. cannot simultaneously teach that encoders 1504 - 1508 are each generic encoders and different encoders each associated with one of a plurality of predefined models, Applicants submit that the present application is patentable and in condition for allowance.

Accordingly, claims 1, 13 and 21 and their dependent claims are patentable. Claim 9 previously recited that each of the plurality of decoders is associated with one of the plurality of predefined models. Since Lee et al. fail to teach this limitation as discussed above, claim 9 and dependent claims 10 - 12 are patentable.

Claim 15 recites routing each portion associated with a model of the plurality of predefined models to an encoder associated with the chosen model. Since Lee et al., as stated by the Examiner, teaches only generic encoding of the defined objects, they fail to teach this limitation of have an encoder associated with a chosen model. Therefore, claim 15 and dependent claims 16 - 17 are patentable. Claim 18 includes a similar limitation and therefore this claim and its dependent claims 19 - 20 are patentable.

### CONCLUSION

Having addressed all rejections, Applicants respectfully request that the proposed amendment be entered and, that upon entry of the amendment, the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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By: Thomas M. Isaacson/

Correspondence Address:

Samuel H. Dworetsky  
AT&T Corp.  
Room 2A-207  
One AT&T Way  
Bedminster, NJ 07921

Thomas M. Isaacson  
Attorney for Applicants  
Reg. No. 44,166  
Phone: 410-414-3056  
Fax No.: 410-510-1433